CHAPTER 6: YOUTH ACTIVITIES

Chapter 6: Youth Activities

Part 664 Youth Activities Under Title I of the Workforce Investment Act

SUBPART A - YOUTH COUNCILS

664.100   What is the youth council?

664.110   Who is responsible for oversight of youth programs in the local area?

SUBPART B - ELIGIBILITY FOR YOUTH SERVICES

664.200   Who is eligible for youth services?

What eligibility details are there for youth?

The youth eligibility requirements, outlined in the Act (Section 101(25)) and regulations, include a few requirements for youth (age, low income, special needs category). Local areas set policies for service priorities if they determine the need is greater than funds available. (See TEN 9-06 for helpful information about documentation and verification of youth eligibility under WIA.)

What are low-income guidelines under WIA?

WIA Section 101(25) details the low-income guidelines for serving economically disadvantaged customers. The term "low-income individual" means an individual who:

- Receives, or is a member of a family that receives cash public assistance such as TANF, SSI, Refugee Assistance, or General Assistance; or
- received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program, that does not exceed the higher of either the poverty guidelines or 70% of the lower living standard income level (LLSIL). In calculating income levels, unemployment compensation, child support payments, public assistance payments, Social Security benefits (old age and survivors) are excluded; or
- is a member of a household that receives (or has been determined within the previous 6 months to be eligible for food stamps); or
- qualifies as a homeless individual, as defined in the Stewart B. McKinney Homeless Assistance Act; or
- is a foster child on behalf of whom State or local government payments are made; or
- is an individual with a disability whose own income meets the low income requirements but who is a member of a family whose income does not meet such requirements.

When making low income determinations that are based on family income, WIA allows for the use of either Department of Health and Human Services (HHS) Poverty Guidelines or the USDOL Lower Living Standard Income Level (LLSIL). These figures are revised annually in the Federal Register, and can be found at www.doleta.gov/llsil/.

Local workforce areas are notified by GDOL Management Information and Customer Support each spring when the new guidelines are released and adjustments have been made in the Georgia Workforce System (GWS) to account for these changes. (See TEN 9-06 for helpful information about documentation and verification of youth eligibility items under WIA.)

Can out-of-school youth ages 18-21 be trained without using an Individual Training Account (ITA) by referring them directly to occupational skills training, paid for with youth funds?

If youth funds are used for non-ITA services, the services must be competitively procured, identified by the local youth council, and approved by the local workforce board in accordance with WIA section 123.

664.205   How is the "deficient in basic literacy skills" criterion in Sec.664.200(c)(1) defined and documented?

What is the definition of basic skills deficiency?

Per common measures TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues, basic skills deficient is defined as: The individual computes or solves problems, reads, writes, or speaks English at or below the eight grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.

States and grantees have the option of establishing their own definition, which must include the above language. Georgia has not, however, chosen to do so.

Has the State established policy regarding the "deficient in basic skills" criterion?

The State provides administrative oversight and support allowing local areas to establish appropriate policy at the local level. Therefore, policy addressing this criterion must be established at the local level.

Must all youth be tested for reading skills before beginning WIA funded training services?

Youth age 14-18 must be tested in order to meet the assessment requirements of WIA Section 129(c)(1)(A). However, partner agency staff should share assessment results when possible to avoid duplication and more efficiently serve customers.

With the implementation of common measures, all youth who are basic skills deficient and out of school will be held to a Literacy and Numeracy Gains measure. To determine whether or not the youth is basic skills deficient, pre and post-testing will be necessary.

> 664.210   How is the "requires additional assistance to complete an educational program, or to secure and hold employment" criterion in Sec.664.200(c) defined and documented?

*H*as the State established policy regarding the "requires additional assistance to complete an educational program, or to secure and hold employment" criterion?

The State provides administrative oversight and support allowing local areas to establish appropriate policy at the local level. Therefore, policy addressing this criterion must be established at the local level.

> 664.215   Must youth be registered to participate in the youth program?

*I*s there a way to assess youth without registering them? Can we "pre-assess" youth so we don't have to register them if WIA isn't appropriate for them?

Although the Final Rules state that all youth *participants* receiving any level of WIA services must be registered, the rules do not preclude pre-assessment or screening in order to determine whether WIA services are appropriate. There is not a requirement to register everyone who is screened. Options for screening include using a school record, when there is one, a basic skills assessment, and other such tools or documentation. Through screening, if is determined that WIA services/registration are not appropriate, the youth can be referred to other resources or services such as HOPE grants, Jobs for Georgia Graduates (JGG), basic Employment Services, Job Corps, community or faith-based organizations, and others that can provide a wide range of youth services without WIA funds or registration.

If, however, the pre-assessment is paid for with WIA funding, the youth must be WIA-registered.

> 664.220   Is there an exception to permit youth who are not low-income individuals to receive youth services?

664.230   Are the eligibility barriers for eligible youth the same as the eligibility barriers for the five percent of youth participants who do not have to meet income eligibility requirements?

664.240   May a local program use eligibility for free lunches under the National School Lunch Program as a substitute for the income eligibility criteria under title I of WIA?

664.250   May a disabled youth whose family does not meet income eligibility criteria under the Act be eligible for youth services?

SUBPART C - OUT-OF-SCHOOL YOUTH

664.300   Who is an "out-of-school" youth?

Are youth considered to be "in-school" when they are placed in residential correctional facilities programs, such as boot camps or juvenile detention that offer school programs? Are youth who dropped out of school and are now attending a GED program considered to be in-school?

No. Youth placed in a correctional facility or boot camp are not considered active participants and will be automatically exited at 90 days after the last date they received a service. These same youth will not be counted in performance, as incarceration is one of the outcomes that is exempt from performance.

Youth who have dropped out of school and are attending GED programs are considered to be out-of-school youth. This is a significant targeted population under common measures.

664.310   When is dropout status determined, particularly for youth attending alternative schools?

664.320   Does the requirement that at least 30 percent of youth funds be used to provide activities to out-of-school youth apply to all youth funds?

SUBPART D - YOUTH PROGRAM DESIGN, ELEMENTS, AND PARAMETERS

664.400   What is a local youth program?

664.405   How must local youth programs be designed?

*A*s the WIA administrative agency, we determine eligibility for youth programs and conduct assessments. Could our service providers conduct these tasks rather than us?

Yes. This is a local decision. Services for intake, objective assessment, and development of the individual service strategy (i.e., the design framework component) are exempt from the competitive process when provided by the grant recipient/fiscal agent. However, it is the role of the youth council to design a service delivery system that meets the needs of youth at the point the individual needs the services. The youth council's evaluation of the proposals offered and how those services fit into the system would then drive recommendations to the local workforce board for funding.

*W*hat is the status of School-to-Work (STW) in Georgia?

Most STW Partnership Grants closed at the end of June 2004. School-to-Work grants were awarded to states for the purpose of building federally funded School-to-Work systems through local partnerships. Most of Georgia's 41 school-to-work partnerships received one-year planning grants, administered by the Department of Technical and Adult Education (DTAE), during the latter half of 1999 - and implementation grants in 2000 and/or 2001. STW projects in Georgia were expected to foster systemic change, and strengthen, expand, or connect the partnerships' initiatives to other ongoing school-to-career activities, thereby integrating these strategies into an overall regional workforce development system.

Most STW Partnership Grants closed at the end of June 2004, but the important work associated with the STW grants has been sustained in many communities through subsequent youth development efforts, including: Georgia's Comprehensive Youth Development Strategy, the AfterSchool Network, Georgia Partnership for Youth Investment, Georgia Afterschool Investment Council, and other system-building efforts.

*W*hat is the connection between School-to-Work (STW) Partnerships and activities, and the youth councils of WIA workforce boards? How can the relationship help better serve youth customers?

The 41 STW Partnerships in Georgia focused on the broad areas of student achievement, career awareness, employer engagement, and youth development. Examples of local STW activities include: offering work-based opportunities for youth; involving parents in their child's learning experiences; understanding employers' needs for better prepared students; and providing professional development opportunities for educators.

The 10 youth program elements defined in Section 129 of the Workforce Investment Act focus on these same areas. In many communities in Georgia, community representatives and leaders quickly realized the value of linking STW and youth council activities, and many individuals serve as partners, board members, coordinators, agency directors, and service providers representing both.

While WIA youth councils are legislatively required to serve a designated population of youth, partnerships have helped them develop a broader "all youth" perspective and a common vision to work together to support all youth in the community. This involves connecting not only STW and WIA, but also Family Connections, Communities in Schools of Georgia, and a variety of other federal, state, and local initiatives, services, and funding.

For more information about Georgia's School-to-Work activities and successes, visit DTAE's STW web site at: www.dtae.org/gastw.

What is Georgia's Comprehensive Youth Development Strategy (CYDS)?

Georgia's Comprehensive Youth Development Strategy was the result of work carried out in 2002 and 2003 by the Youth Services and School-to-Work Committees of the Georgia Workforce Investment Board with the Georgia STW initiative and School and Main Institute consultants. In 2003, CYDS became obsolete when it merged with the emerging Afterschool Network.

Historically, communities were tasked with putting together a strategy to support youth services at the regional level. In many cases, the WIA youth council itself or specific members of the council facilitated this work, while the funding for this initial planning was administered through the STW Partnerships. The regional infrastructure that was formed in 2002 continues to serve as a vehicle for researching youth issues, as a source for efficient regional youth service strategies, and for other strategic uses.

Additional resources include:

- USDOL Youth Services: www.doleta.gov/youth%5Fservices/
- Georgia School-to-Work CYDS: www.dtae.org/gastw/cyds.html
- School and Main Institute: www.schoolandmain.org/
- Toward a Blueprint for Youth: www.ncfy.com/publications/blueprint.htm
- Youth Council Toolkit: www.doleta.gov/youth_services/toolkit_2002.cfm

What is the Georgia Afterschool Investment Council?

The Georgia Afterschool Investment Council (GAIC) came about as a result of a merger that took place in 2003 between two important groups working on outcomes for youth in Georgia: the Comprehensive Youth Development Strategy System and the emerging Afterschool Network. These two collaborative groups formed the predecessor group called the Georgia Partnership for Youth Investment (GPYI) which has its roots in Georgia's regional and county infrastructures. In December 2005, the organization changed its name to the Georgia Afterschool Investment Council.

The GAIC is a statewide organization comprised of nearly 60 coalition partners from the non-profit, public, and private sectors, including the following: Georgia Department of Labor, Community In Schools/Georgia, DTAE, Georgia Family Connection Partnership, the Department of Education, United Way, Department of Juvenile Justice, the Georgia PTA, and all other required partners represented in USDOL's youth vision.

Out-of-school time is the cornerstone of GAIC's work, and their overall goal is to build a healthier system in Georgia to improve the lives of youth. Their efforts are tied to the broad goals of: building the state's capacity around ways to serve youth before and after-school and in the summers; raising public awareness; providing staff working in afterschool programs with the necessary tools and strategies they need to keep kids engaged and succeeding; and strengthening ties to the business community so that afterschool programs grow to be even more responsive to workforce development needs.

For additional information, visit the Georgia Afterschool Investment Council at: http://afterschoolga.org/.

What is USDOL's Strategic Youth Vision?

In July 2004, USDOL issued TEGL 3-04, "The Employment and Training Administration's (ETA's) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act (WIA)." The TEGL emphasized that out-of-school youth (and those most at risk of dropping out) are an important part of the "supply pipeline" needed by employers to fill job vacancies in the knowledge economy.

Key components of USDOL's youth vision include a focus on the following:

- Alternative Education
- Business Demands, Especially in High-Growth Industries and Occupations
- Neediest Youth (including out-of-school youth, high school dropouts, runaway and homeless youth, youth in foster care (and aging out of foster care), court involved youth, children of incarcerated parents, and migrant youth)
- Improved Performance

The new vision and strategies require our workforce system to serve as a catalyst for bringing together employment, education, and economic development in Georgia.

In May 2006, USDOL issued TEGL 28-05, "The Employment and Training Administration's (ETA's) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act (WIA): Expanding ETA's Vision for the Delivery of Youth Services under WIA to include Indian and Native American Youth and Youth with Disabilities." This guidance further expanded "neediest youth" to include: Indian and Native American Youth, and youth with disabilities.

*W*e understand USDOL's strategic youth vision was developed in response to a White House Task Force report. Where can we get more information about this report?

The White House Task Force for Disadvantaged Youth, created in December 2002 by President Bush, released its final report in October 2003. The report presented a national youth policy framework designed to support all young people in growing up to be healthy and safe and ready to participate in work, college, military service, marriage, family, parenting, and civic engagement and service. To promote these positive outcomes for disadvantaged youth, the Task Force recommended improving Federal programs through better management, better accountability, better connections, and giving priority to the neediest youth. The report can be found at: www.ncfy.com/publications/whreport.htm.

*W*hat has Georgia done to implement USDOL's Youth Vision?

Georgia has a rich history of collaboration in the development of systems to serve needy youth (see previous questions related to School-to-Work, Comprehensive Youth Development Strategy, Georgia Partnership for Youth Investment, and Georgia Afterschool Investment Council). Therefore, implementation of USDOL's new youth vision in 2004 was actually a continuation and expansion of many activities already in place, for example:

- Alternative Education- Local and state workforce partners have forged strong collaborative links with school systems to develop flexible funding mechanisms, maximize resources, and provide a bridge to adult education, post-secondary school, and/or work.
- Business Demands, Especially in High-Growth Industries and Occupations- The State and local workforce areas have provided youth with labor market information to help them understand the changes in industry and how best to prepare for those changes. For example, GDOL Workforce Investment and Analysis developed Education Rocks! with high school students in mind. The scripted Education Rocks! PowerPoint presentation allows career advisors to introduce youth to many different types of data, and is a great starting point for career exploration.
- Neediest Youth- Local and state workforce partners have formed various collaborations to look at the specific needs of the neediest youth, i.e., foster youth, youth in the juvenile justice system, children of incarcerated parents, migrant youth, youth with disabilities, and Indian and Native American youth. For example, the 2006 GDOL Summer Youth Work Experience Program gave preference to participants in the GDOL High School/High Tech program which serves youth with disabilities. Also, there are currently Disability Navigators in most WIA One-Stops and GDOL career centers who help ensure local systems better serve youth and adult customers with disabilities. Georgia's Jobs for Graduates is a school-to-work transition program designed to provide high school students with pre-employment training, work skills, motivational activities, and job development.

- Improved Performance- GDOL is addressing performance issues by developing and disseminating regular WebFOCUS reports to local workforce areas to assist in better managing local programs on a "real time" basis.

How can our Local Workforce Board continue to better align our youth services with USDOL's Youth Vision?

USDOL's vision has four major components: focus on alternative education, meeting the demands of business, focus on neediest youth, and focus on improved performance.

Alternative Education
Possible strategies include:

- Strengthening the referral process between Secondary/Adult Education and WIA services to promote timely intervention with youth who have recently dropped out of school or who are at high risk of dropping out
- Increasing the number of youth served in WIA and GDOL-sponsored activities centered on Career Exploration and the connections between academic and professional success
- Enhancing coordination with local school systems and Adult Education to maximize the number of high school students who pass the Georgia High School Graduation Test or GED test through increased opportunities for tutoring, summer instruction, and mentoring

Meeting Business Demands
Possible strategies include:

- Supporting and encouraging local area programs that pair youth and business such as apprenticeship programs and work experience, so that youth gain the skills necessary to access the workforce even if they do not attend post-secondary school
- Enhancing the quality of summer employment opportunities and internships through Employer Committees and contacts with local GDOL career center.
- Providing data and evidence in a youth-focused format so that youth understand what changes are occurring in industry and will be prepared to participate as workers of the future
- Expanding programs that teach soft skills to youth so that they are able to adapt to the expectations of employers

Neediest Youth
Possible strategies include:

- Reaching out to existing youth service providers to learn how to improve linkage, including community-based and faith-based organizations

- Ensuring that key agencies and programs are represented on the Youth Council, for example, by including the DHR Independent Living Coordinator who is responsible for foster youth transitioning out of foster care
- Discussing USDOL's vision, including State resources, with the Youth Council and full Local Workforce Board regularly to serve as the basis for strategic planning
- Strengthing linkages with the school system to identify and provide timely interventions to reduce the number of students dropping out
- Exploring creative outreach strategies to engage the target populations
- Developing "earn and learn" services for older youth who say they "just want to work" to help them increase their value to an employer
- Creating meaningful services and support and incentive policies that meet the needs of youth and encourage continued participation
- Creating or linking to strong mentoring systems (e.g., National Guard Youth ChalleNGe)

Improved Performance
Possible strategies include:
- Examining program design and its impact on performance
- Talking with peers and state staff about what others are doing to enhance their programs

What are the State's procurement requirements for WIA youth services?

Each local workforce board must identify youth providers taking into consideration the recommendations of its youth council. Community youth provider networks will be tapped first to ensure all available resources are considered prior to obligating WIA funds. This allows new funds to fill gaps and enhance, rather than duplicate, services. Competitive grant or contract award decisions will include the state-level criteria listed below, as well as any determined by the local youth council or board.

Selected youth providers must have:

- A service that is not already accessible within the local system
- Adequate financial resources to deliver proposed services, or the ability to obtain the resources
- Ability to meet the program design specifications at a reasonable cost, as well as the ability to meet performance goals
- A satisfactory record of past performance
- A satisfactory record of integrity, business ethics, and fiscal accountability
- Necessary organization, experience, accounting, and operational controls
- Technical skills to perform the work

Local Boards are also asked to give preference in grant awards to programs that:

- Assist youth in furthering their schooling
- Expose youth to the world of work
- Ensure adequate support, supportive services, mentoring, and follow-up
- Provide comprehensive guidance and counseling services
- Provide linkages between academic and occupational learning
- Encourage leadership development
- Have strong connections to employers and the local job market

Local Boards should strive to link grants to services provided through STW initiatives wherever possible. New providers may receive contingent approval, in accordance with local policy, where the provider is proposing a quality program design and exhibits demonstrated staffing and financial capacity. These criteria may also be used to evaluate effective and ineffective activities and providers. Local Boards are free to establish any additional evaluation criteria they choose. (See additional state policy outlined at 667.200.)

*W*hat is the John H. Chafee Foster Care Independence Program noted in Training and Employment Notice 18-05 (TEN) and how can we access this funding to expand services to the foster youth in our area?

TEN 18-05, John H. Chafee Foster Care Independence Program, explains how the program provides training dollars for youth transitioning out of foster care and describes how WIA programs can leverage these funds. In Georgia, the John H. Chafee Foster Care Independence Program is called Georgia's Independent Living Program (ILP), and is administered by the Department of Human Resources. Local areas serving foster youth or those who are transitioning out of foster care need to coordinate with the DHR Independent Living Program Coordinator to expand services and avoid duplication. ILP funding may be used for training vouchers for tuition, books, and school equipment. Other wraparound services may be developed such as mentoring, counseling, employment, and other support services.

For additional information on services for foster youth, please visit:

- National Child Welfare Resource Center for Youth Development: www.nrcys.ou.edu/yd/
- National Foster Care Coalition: www.nationalfostercare.org/

*H*ow can we better serve homeless youth?

Homeless and runaway youth are addressed in USDOL/ETA's New Strategic Vision for the Delivery of Youth Services and are included in the definition of "neediest youth."

By definition, homeless youth lack a "fixed, regular, and adequate nighttime residence" and include: youth sharing housing (i.e., doubled-up), living in motels, camp grounds, cars, emergency or transitional shelters; abandoned youth or youth awaiting foster care placement; migratory youth; and youth displaced by hurricanes and other natural disasters. Other youth lack the skills necessary to live independently (e.g., youth in the juvenile justice system) and are at great risk of becoming homeless.

TEN 15-05, Providing Employment and Training Services to Homeless and Runaway Youth, provides a wealth of information and resources to serve this population and identifies several possible avenues for collaboration. For example, HHS provides funding nationally to community-based organizations and agencies to serve homeless and runaway youth. Therefore, you are encouraged to collaborate with community and faith-based organizations that serve youth and families in addition to Georgia's Independent Living Program (administered by DHR). Linkage with Juvenile Justice in order to reach youth exiting the justice system is also recommended. Various models of effective collaboration are also included in the TEN, and there are links to numerous web sites.

664.410   Must local programs include each of the ten program elements listed in WIA section 129(c)(2) as options available to youth participants?

What opportunities do 14-21 year old youth have in Georgia through local WIA areas, Georgia Department of Labor (GDOL) career centers, and partners?

An array of youth services that includes the 10 elements required under WIA (129(c)(C)(iv)(II)(2)) must be available in all local areas, but the actual service mix differs among communities, as does the actual service provider. Service providers may include GDOL career centers, GDOL Jobs for Georgia Graduates, schools, WIA entities and service providers, community and faith-based organizations, employers, and others. Examples of youth services that GDOL and WIA local areas are providing include: paid work experience, unsubsidized employment, GED preparation, specialized vocational training, academic enrichment activities, summer school, internships, mentoring, job preparation, career exploration, apprenticeship programs, leadership programs, job shadowing, and community service, in various combinations.

Should we require background checks on adults supervising children in our youth programs?

This is a local area decision; however, local areas are encouraged to check with their Department of Human Resources partners for the guidelines they use in oversight of programs or services involving children.

664.420   What are leadership development opportunities?

664.430   What are positive social behaviors?

664.440   What are supportive services for youth?

*I*s there a definitive list of support services we can provide our youth customers?

No. There is no definitive list, although the WIA regulations list the following support services that may be provided: transportation; child care; dependent care; housing; needs-related payments; linkages to community services; referrals to medical services; and assistance with work attire and work-related costs, including such items as eye glasses and protective eye gear. The regulations clarify that this list of examples is meant to be *illustrative* rather than *exhaustive*.

The Act and Regulations indicate that the approach to serving youth needs to differ from the approach used for adults and dislocated workers. Youth program designs should be more individually-focused, as youth needs often differ from those of adults and dislocated workers. We encourage flexibility and creativity in your local support policies.

WIA funds are one of many possible funding sources that you will need to explore in order to determine what support services to provide to youth through WIA in your community. Local policy must address coordination with other entities to ensure non-duplication of resources and services, and limits on the amount and duration of such services. Local areas must ensure that the services provided are needed for the individual to participate in appropriate activities and are not available through other sources.

*C*an we use support service funds as incentives/rewards to encourage youth to complete programs or meet certain benchmarks?

While the Act is silent on whether incentive payments are allowable under the Adult and Dislocated Worker programs, Section 129(a)(5) specifically identifies incentives as allowable under the WIA Youth program. Specifically, incentive payments may be provided to recognize and reward achievement in the youth program, motivating youth to continue participating in WIA services. These payments, however, differ from support payments which are based on need. The local policy should address what clearly measurable benchmarks the youth will attain in order to earn the incentive.

We encourage local areas to be flexible and creative in their approach. While a monetary reward may be an effective motivator for many youth, other non-monetary supports may be just as effective. For example, you might want to consider working with community partners to donate such items as a restaurant certificate, a pass to a coveted entertainment/ leadership event, or free studio time (to record a rap demo). The best way to know what motivates youth customers is to ask them, and use their feedback to shape your support policy.

As with all WIA support payments, keep in mind that WIA funds are one of many possible funding sources that you will need to explore in order to determine whether it makes sense to support a particular activity through WIA in your community. Local policy must address coordination with other entities to ensure non-duplication of resources and services, and limits on the amount and duration of such services.

We are trying to increase the number of foster youth we serve. Since these youth are under the care of the State, should we use WIA support services for foster youth?

If a specific need is identified for which support services for foster youth are appropriate, it is suggested you first contact the individual youth customer's DFCS caseworker to see if the service(s) is available through DFCS. If the particular service(s) is not available through DFCS or any other sources, then you would need to adhere to your local support policy used for all other customers.

Strong linkage with your partners is key to ensuring non-duplication of resources and services.

664.450   What are follow-up services for youth?

We understand that follow-up services for youth (but not adults) are reported to the U.S. Department of Labor (USDOL). What exactly are youth follow-up services?

Follow-up services for youth, required for a minimum of 12 months, are listed in Section 664.450 of the WIA Final Rules. These include, but are not limited to: leadership development and supportive services; regular contact with a youth participant's employer; assistance in securing better paying jobs; work-related peer support groups; adult mentoring; and tracking the progress of youth in employment after training. The combination and duration of services provided must be based on the individual customer's needs.

664.460   What are work experiences for youth?

Where can I get information about child labor laws and requirements for youth work permits in Georgia?

Today, approximately 80% of all students will work sometime during high school. Child labor laws ensure youth will have the necessary time to pursue their education and be employed in a safe workplace. Georgia's child labor law was written in 1878, whereas the federal child labor law is provided for under the Fair Labor Standards Act (FLSA) enacted in 1938. When there are differences between federal and state laws pertaining to child labor, the law providing the more stringent standard is observed.

Effective May 4, 2004, a Work Permit, is required for all youth under the age of 18. Minors may obtain Work Permits from:

- A school Issuing Officer (including most private schools)
- The county School Superintendent's office

For additional Child Labor information, please visit: www.dol.state.ga.us/em/child_labor.htm. In addition to a variety of state and federal information and resources, including WIA-specific information and contact information, this is the access point for the system designed to allow authorized Issuing Officers, employers, or minors to start work permits online.

664.470   Are paid work experiences allowable activities?

May we place a youth in a limited internship with a private sector employer, paying all costs with WIA funds?

Yes. WIA funds are one of many possible funding sources that you will need to explore in order to determine whether it makes sense to support this activity through WIA funds in your community. If so, WIA funds may be used to pay wages and related benefits for work experience in the public, private, for-profit, or non-profit sectors as long as comprehensive assessment and the customer's service plan indicate a work experience activity is appropriate for the individual.

SUBPART E - CONCURRENT ENROLLMENT

664.500   May youth participate in both youth and adult/dislocated worker programs concurrently?

664.510   Are Individual Training Accounts allowed for youth participants?

Can ITAs be used for youth training? What if the youth is being served as an adult?

Adults, dislocated workers, and youth ages 18-21 (who may be considered adults) may access ITAs. All other youth training or youth services must be competitively procured (with limited non-competitive provisions), identified by the local youth council and approved by the local workforce board in accordance with WIA Section 123.

In February 2003, USDOL granted GDOL's waiver request to allow older out-of-school youth access to adult ITAs while maintaining their older youth identity for expenditure purposes. If local WIA areas choose to use this option, we think it will provide the chance for increased older youth expenditures, positive credentialing outcomes, and reduced dual enrollment (adult/youth) tracking.

We also urge local workforce areas to carefully consider the impact on older youth and adult performance outcomes that may occur with the use of this waiver option.

If local workforce boards choose to use this waiver option, they must:

- Assure that all ten required WIA youth program elements at 664.410 will be available within the local area that serves older out-of-school youth with ITAs
- Establish guidelines for the use of older youth ITAs, including criteria for determining when the use of ITAs is appropriate, and how to assist youth in choosing an appropriate service provider and program
- Incorporate the information into the local WIA plan

SUBPART F - SUMMER EMPLOYMENT OPPORTUNITIES

664.600   Are Local Boards required to offer summer employment opportunities in the local youth program?

Does the linkage of occupational and academic services for summer youth activities have to be concurrent?

No. While summer youth employment activities *must* provide direct linkages to academic and occupational learning, and *may* provide other elements and strategies as appropriate to serve the needs and goals of customers, the linkages do not have to be concurrent. Linkage may be concurrent when it makes sense, or sequential, based on the individual customer's assessment and service strategy. It may be helpful to consult with your local educators and other youth providers to explore the issue of educational/occupational linkage in your local area.

What is the GDOL Summer Youth Work Experience Program?

The GDOL Summer Youth Work Experience Program was initiated by Commissioner Michael Thurmond in 2003 to give teens and young adults experience and training in the workforce during their summer vacation. Local workforce areas have received grants each summer since 2003 to enable them to develop jobs in the public and private sector to meet the needs of more youth in their communities. Since 2003, over 4,500 youth have been served with an allocation of over $4.5 million.

While preference is given to youth from low-income families, local areas are also allowed to serve up to ten percent non-WIA youth. Beginning in 2006, preference was also given to youth with disabilities enrolled in the GDOL High School/High Tech program. Statewide, 1,100 youth were enrolled in 2006.

The GDOL Summer Youth Work Experience Program helps local areas increase their capacity to provide much-needed summer services to youth.

664.610   How is the summer employment opportunities element administered?

664.620   Do the core indicators described in 20 CFR 666.100(a)(3) apply to participation in summer employment activities?

SUBPART G - ONE-STOP SERVICES TO YOUTH

664.700   What is the connection between the youth program and the One-Stop service delivery system?

664.710   Do Local Boards have the flexibility to offer services to youth who are not eligible under the youth program through the One-Stop centers?

SUBPART H - YOUTH OPPORTUNITY GRANTS

664.800   How are the recipients of Youth Opportunity Grants selected?

Have any Youth Opportunity Grants been awarded in Georgia?

Yes. In 2000, Southwest Georgia received an award to serve youth within certain areas of the Albany city limits. The immediate focus of Albany YO! was to have out-of-school youth complete their GED and encourage in-school youth to obtain a high school diploma. Youth development services included: GED preparation, resume writing, SAT preparation, tutoring, public speaking, leadership training, entrepreneurship, career counseling, and job development. The four-year grant expired in 2004, having achieved very successful results.

What happened to the USDOL's Office of Youth Opportunities/Youth Opportunity Grant Technical Assistance Updates? Even though we don't have a Youth Opportunity Grant, we'd like to find out more about this resource as it had some really good ideas for serving youth.

Much of the information in Youth Resource Connections (formerly Youth Opportunity Grant Technical Assistance Updates) applies directly to the wider audience providing youth services. These technical assistance updates, which cover a wide range of topics related to youth, are concise and easy to read.

A variety of youth resources, including the Youth Resource Opportunity newsletter, are at: www.doleta.gov/youth%5Fservices/. You can join the ListServ to receive these monthly TA updates.

In addition to the Youth Resource Opportunity newsletter, USDOL also offers FLASH FAX for staff working with young offenders. FLASH FAX is a weekly email update that contains the latest information and resources on topics such as workforce development, youth advocacy, training and technical assistance, juvenile justice, and more.

664.810   How does a Local Board or other entity become eligible to receive a Youth Opportunity Grant?

664.820   Who is eligible to receive services under Youth Opportunity Grants?

664.830   How are performance measures for Youth Opportunity Grants determined?

CHAPTER 7: PART 666 PERFORMANCE ACCOUNTABILITY

Chapter 7: Part 666 Performance Accountability

PART 666   Performance Accountability Under Title I of the Workforce
            Investment Act

SUBPART A - STATE MEASURES OF PERFORMANCE

666.100   What performance indicators must be included in a State's
             plan?

*Unemployment Insurance (UI) data will be used for performance data,
but will follow-up for customer satisfaction continue? If so, is this a
program cost?*

The activities necessary to evaluate performance are considered program costs. UI data
will be used for many of the performance measures. The State will pay for costs
associated with the matching of participant records to the UI wage file.

Under WIA, the State must administer a customer satisfaction survey to a sample of
individuals through a phone survey. Follow-up for customer satisfaction will continue, at
least until WIA is reauthorized. The cost of customer satisfaction is also a program cost.
The State is paying for the customer satisfaction surveys and local area American
Customer Satisfaction Index (ACSI) licenses.

What employer base is used for the employer satisfaction measure?

Employers that placed job orders with Georgia Department of Labor (GDOL)
career centers represent the core of the employer base for the employer satisfaction
measurement because they make up the majority of employers who have significant
contact with the local workforce development system. (See TEGL 7-99 and TEGL 6-00,
available at: http://wdr.doleta.gov/directives/).

Will customer satisfaction questions be asked only of WIA customers?

For WIA performance measurement, WIA participants and employer customers
will be asked customer satisfaction questions. Customer satisfaction of employers and
participants are two of the 17 WIA performance measures. Potential participants for the
surveys include all WIA exited customers. The employer sample is selected from job
orders received by GDOL career centers. Both of these measures are reported to the U.S.
Department of Labor (USDOL) in GDOL's annual report. See TEGL 6-00 at:
http://wdr.doleta.gov/directives/ for details.

666.110   May a Governor require additional indicators of performance?

*H*as the State developed additional indicators of performance?

Additional performance indicators have not been developed.

666.120   What are the procedures for negotiating annual levels of performance?

666.130   Under what conditions may a State or DOL request revisions to the State negotiated levels of performance?

666.140   Which individuals receiving services are included in the core indicators of performance?

666.150   What responsibility do States have to use quarterly wage record information for performance accountability?

*A*re there plans to change the wage record collection system to gather more data?

There are ongoing discussions about collecting more data from wage records. Start date, weeks worked, occupational data, hourly/weekly pay, and other items would all be useful for labor market analysis and performance measurement. Reporting burdens on the employers must also be considered, however, and there are no immediate plans to change the system.

*W*ill the Wage Record Interchange System (WRIS) be checked even if wages are found in Georgia?

In the past, all states except Hawaii participated in WRIS, and the answer to this question was "Yes." WRIS would be checked to ensure that all wages the customer earned during the reporting period were captured.

WRIS is in the process of being transitioned from NASWA to USDOL/ETA. Negotiations and amendments are currently being addressed. For additional information about WRIS or to access the list of states currently participating in WRIS, visit: www.doleta.gov/performance/WRIS.cfm.

*W*hat's the policy on releasing wage file information to partners? Can partners get wage information prior to registration?

Local area staff has access to wage files, and use of the information should be discussed among partners to enable optimal services for customers. Any release of state UI wage information is bound by confidentiality statutes to protect the wage data. Release to partners would be contingent upon having data sharing agreements and abiding by confidentiality restrictions.

Wage Record Interchange System (WRIS) data (i.e., wages from other states) may not be released, however, in individually-identifiable form. The WRIS Data Sharing Agreement further limits the release of aggregate data containing WRIS wages to cell sizes of at least five records. This means that some reports for local areas would have suppressed results if there were fewer than five customers in the measure.

*U*I data is used for many of the performance measures, but if someone is not found in the UI wage records, can supplemental data be used?

Yes. Local areas may collect supplemental data about employment through case management, follow-up services, and surveys of customers to determine if they are employed and to obtain documentation of that employment.

In Georgia, over 90% of employees are in employment covered by UI. WIA Section 136(f)(2) specifies using quarterly wage UI records in measuring progress on state and local employment, retention and wage performance measures. In addition to UI wage records within a state, the WRIS will enable the tracking of UI wage records across states.

While the majority of employment in a state's workforce will be covered in the UI wage records, certain types of employers and employees are not reportable under Georgia's UI law, such as those who are self-employed. If individuals are not found in the UI wage record sources, supplemental data may be used for the entered employment and retention measures, but may not be used for the earnings change/replacement measures, according to USDOL.

*D*o we have to use supplemental data?

No. The use of supplemental data is not required. State and local area negotiated levels of wage-base performance measures are based solely on UI wage records. Each local area will need to decide how much effort and resources to devote to collecting supplemental data for the WIA entered employment and retention performance measures. States have flexibility in methods used to obtain wage information on participants in uncovered employment. Generally, this information will be gathered through case management, follow-up services, and surveys – similar to the methods that local areas may use to obtain credential data. Supplemental data is captured in the Georgia Workforce System (GWS).

USDOL has stringent requirements for supplemental employment data, and all data and methods to supplement wage record data are subject to audit. For state purposes, this simply means that we should be able to talk to the same person you did, or view the same document/record to verify the data.

*D*o military wages include just salary, or compensation packages also? This can affect earning gains for areas with military bases.

USDOL has been discussing automated record matching for federal and military employment. If this occurs, it will most likely include wages only.

SUBPART B - INCENTIVES AND SANCTIONS FOR STATE PERFORMANCE

666.200   Under what circumstances is a State eligible for an Incentive Grant?

666.205   What are the time frames under which States submit performance progress reports and apply for incentive grants?

666.210   How may Incentive Grant funds be used?

666.220   What information must be included in a State Board's application for an Incentive Grant?

666.230   How does the Department determine the amounts for Incentive Grant awards?

666.240   Under what circumstances may a sanction be applied to a State that fails to achieve negotiated levels of performance for title I?

SUBPART C - LOCAL MEASURES OF PERFORMANCE

666.300   What performance indicators apply to local areas?

Has the State applied additional indicators of performance to local areas?

Additional indicators have not been applied.

What kind of training and technical assistance is available on performance issues? One-Stop staff, training providers, Local Board members, and others need performance information in an easy-to-understand format.

For current performance information, you can visit USDOL's web site at: www.doleta.gov/performance/. A comprehensive list of federal issuances can be found at this site. The most recent Federal guidance regarding the performance measures on which states are currently reporting is TEGL 17-05.

Each local workforce area has an assigned GDOL Career Development Services Field Representative to whom questions or requests for additional guidance may be addressed. Local areas may also contact GDOL Management Information and Customer Support with specific questions. Additionally, local areas may utilize online self-paced tutorials on performance measures at: www.spra.com/PEP.

Local areas are encouraged to utilize WebFOCUS reports established by state personnel or to create performance reports in customized formats based upon the information needed. If assistance is needed to create customized reports, please contact your GDOL Career Development Services Field Representative.

How is performance for the core indicators for WIA younger youth measured and reported?

There are separate performance measures for older youth (19-21) and younger youth (14-18). The measures for older youth, which are very similar to the adult and dislocated worker measures, include: entered employment rate, employment retention rate, earnings change, and credential rate. The three younger youth measures are: skill attainment rate, diploma or equivalent rate, and retention rate. Specific information about these measures is in Georgia's "A Guide to the WIA Performance Measures" (currently under revision) and at USDOL's web site: www.doleta.gov/performance/. Both youth groups are also included in the participant customer satisfaction measure with adults and dislocated workers and in the new youth common measures.

How are the annual performance measures calculated?

Details on the calculations of the WIA performance measures can be found in various USDOL issuances at: www.doleta.gov/performance/. Local areas can also utilize online self-paced tutorials on performance measures at: www.spra.com/PEP.

If an older youth already has a GED or high school diploma, wants a job but has low reading and math skills, may we serve the youth under WIA? We're wondering whether our performance will be adversely affected.

Yes, the older youth may be served under WIA. In a comprehensive workforce development system, each barrier, whether basic skills, transportation, or limited work or occupational skills, should be addressed so that the customer can successfully find, keep, and progress on both immediate and future jobs.

Most communities have organizations that help individuals with reading and math skills, in which case the local area will not need to use WIA funds for this purpose. WIA is intended to help create a system that increases access to community services, but WIA funding is used only when no other resources are available.

If an assessment of resources available and services needed indicates the customer does need WIA intensive or training services, the services should be provided. When services lead to a credential, use GWS to record it. Do the same when the customer obtains employment.

There is nothing in WIA or its performance accountability system that should exclude a customer from receiving the services he/she needs because that person may not contribute positively toward a particular performance measure. Not every older youth will strive to earn a credential; the state performance goal for this measure acknowledges this fact.

If an older youth states he "only wants to work" but also needs help with basic skills or work habits, are we restricted to serving him in the adult program? How will outcomes be counted?

Each customer, no matter what age, should be provided the services he/she wants and needs, with the funding source invisible. Any youth between the ages of 18-21 at registration may be served with adult funds in addition to, or in lieu of, the youth system. If both funding streams serve the youth, outcomes will be counted in both youth and adult measures. Keep in mind that serving at-risk youth, both younger and older, will likely be a long-term process spanning more than one year and more than one fund source, until skill and employment goals are met.

As far as performance calculations, what happens when a customer dies?

TEGL 17-05 states that "A participant in any of the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, may be excluded from common measures." The categories are: Institutionalized, Health/Medial or Family Care, Deceased, Reserve Forces Called to Active Duty, and Youth Relocated to a Mandated Program (e.g., foster care, juvenile justice system). There is a field in the Georgia Workforce System (GWS) to record the appropriate exclusion and the date the exclusion information was collected.

What is the definition of a credential? What is the definition of a certificate? What is the difference between the two in relation to WIA performance?

Per TEGL 17-05, a credential may be a degree or certificate that is recognized by a local area, the State, or nationally. Credentials include, but are not limited to, a high school diploma, GED or other recognized equivalents, post-secondary degrees/certificates, recognized skill standards, and licensure or industry-recognized certificates.

Credentials should include both core (e.g., communication, leadership, critical thinking) and occupation-specific (e.g., identified through job task analyses) competencies.

A credential should:

- Be valid and credible with employers within the industry to which it relates
- Be able to be assessed against objective, occupation-specific competency standards recognized by the industry to which it relates
- Be able to be assessed against cross-industry work readiness standards, which include the eight categories defined by SCANS (Secretary's Commission on Achieving Necessary Skills)
- Be transferable to other organizations or occupational clusters within the industry to which it relates
- Be portable across regional or national boundaries
- Be endorsed by a local, regional, state, or national organization or association that is an industry-recognized authority
- Promote worker mobility across the relevant industry or to related industries
- Be in a form that allows for regular updating to take into account technological or other developments within the industry
- Not discriminate with respect to race, color, gender, age, religion, ethnicity, disability, or national origin, consistent with federal civil rights laws
- Use various evaluation techniques, including, where appropriate, oral and written evaluations, portfolio assessments, and performance tests

The certificate definition applies to any WIA participant that has the date of their first training service or youth-funded service *on or after* July 1, 2006. Per TEGL 17-05, a certificate is awarded based upon attainment of technical or occupational skills and is based upon standards developed or endorsed by employers. For this reason, certificates awarded by local workforce investment boards and work readiness certificates are not included.

For additional information, see USDOL's resources at: www.doleta.gov/performance/. Also, see TEGL 17-05 for information about the changing of definitions and applicability of credentials/certificates for the purpose of performance measures. Please note that a WIA performance measures guide is currently under development and will be distributed to local workforce areas upon completion.

What are the standard types of certificates?

As stated in TEGL 17-05, certificates should be awarded by:

- A state educational agency or a state agency responsible for administering vocational and technical education within a state.

- An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by Title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal student financial aid programs.
- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or a product manufacturer or developer (e.g., Microsoft Certified Database Administrator, Certified Novell Engineer, Sun Certified Java Programmer) using a valid and reliable assessment of an individual's knowledge, skills, and abilities.
- A registered apprenticeship program.
- A public regulatory agency, upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., FAA aviation mechanic certification, state certified asbestos inspector).
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons.
- Job Corps centers that issue certificates.
- Institutions of higher education that is formally controlled, or has been formally sanctioned, or chartered, by the governing body of an Indian tribe or tribes.

What types of training can generate certificates?

Examples of types of training leading to a certificate include, but are not limited to:

- Occupational skills training
- Educational achievement certificates (e.g., HS Diploma, GED)
- Adult education and literacy activities
- Programs that combine workplace training with related instruction
- Skills upgrading and retraining
- Customized training

For out-of-school youth who do not pass the GED, how will this credential be documented for those youth that were employed only (did not attend post-secondary or advanced training, and are still employed at the end of the third quarter after exit)?

Not every customer will earn a credential. All older youth that exit will be counted in the denominator for this measure; since there was no credential earned, however, this customer will not count toward the numerator. If this customer was unemployed at registration, there will be a positive outcome for the entered employment and employment retention measures.

If this was a younger youth (age 14-18 at registration), passing the GED could count toward the diploma or equivalent attainment rate. Ensure that you record credential and diploma information on the WIA Follow-Up page or Registration page in GWS.

Local areas and partners are encouraged to think more globally about WIA as a system connecting existing community resources, rather than a primary source of direct training for customers. In this light, GED services alone would normally be offered through an organization not funded by WIA. No matter how the GED services are funded, a customer who does not pass the GED test should not be abandoned or exited, but assisted to help meet the benchmark. Goal attainment will often be a long-term process spanning more than one year if appropriate.

If a youth is still in post-secondary/advanced training at the end of the third quarter after exit, will our local workforce board be penalized because the youth has not yet attained a credential/certificate?

From the question, it is not clear why the youth must exit before completing training and earning a credential/certificate. But if that is the case and the older youth has exited all WIA services (except follow-up), is still in post-secondary education or advanced training three quarters later, and has not earned a credential/certificate, the youth will not count toward the numerator in this measure. This is not a penalty for the board; the expected performance for this measure reflects that not all older youth will earn a credential/certificate.

For virtually all customers, a credential/certificate is only one of many steps involved in moving on a career path toward a first job, a better job, and lifelong learning. A single credential/certificate should rarely be the ultimate goal for a customer.

Do Individual Educational Plan (IEP) diplomas and other alternative secondary school exit documents awarded to youth with disabilities count as a degree in the attainment of a degree or certificate measure?

Participants with a disability who successfully complete an Individual Education Program (IEP) for youth with disabilities are considered to have attained a high school diploma. However, if "other alternative secondary school exit documents" means a "Certificate of Completion," it is important to remember that a Certificate of Completion is given both to students with disabilities *and* other students who do not meet the requirements for graduation (i.e., those who failed to pass the Georgia High School Graduation Test). The term IEP and Certificate of Completion can not be used interchangeably. Attainment of a High School Diploma may only be claimed as an outcome if the student has a disability and has successfully completed the requirements contained in the IEP.

Please note that under the upcoming common measures, USDOL has stated that IEP diplomas will not be recognized as equivalent to High School Diplomas or GEDs for federal reporting purposes.

*A*n independent national trainer raised the idea that Cardio Pulmonary Resuscitation (CPR) certification would be an acceptable credential for WIA youth. Is it?

Yes, in some cases. Attainment of a recognized credential is related to achievement of educational skills (such as a secondary school diploma or its recognized equivalent), or occupational skills, by participants who enter post-secondary education, advanced training, or unsubsidized employment.

CPR would meet these requirements for those youth being trained as certified nursing assistants, emergency medical technicians, lifeguards, or other health related occupations as part of the occupational skill credential in their approved training plan. Even if it is not a formal credential "taken," CPR and first aid training could be a good first exposure to health occupations that could lead to a successful experience for youth and provide a spark to interest them in health occupations.

666.310   What levels of performance apply to the indicators of performance in local areas?

*L*ocal workforce areas now negotiate their goals for the 17 WIA performance measures annually. What is the minimum acceptable level of performance areas must attain?

There is no requirement for local areas to negotiate or renegotiate performance levels each year. While the opportunity exists to renegotiate performance levels each year, this is strictly optional. Local areas set performance targets as part of their planning process. Areas will be setting their targets for PY07 and PY08 in the next plan update.

USDOL has defined the minimum acceptable level of WIA performance for states at 80% of the negotiated levels. Georgia has adopted this definition for local area performance. For example, an area that had a goal of 70% for the adult entered employment rate but achieved 56% (80% times 70%) would be considered as having an acceptable level of performance for that measure.

*C*an you explain Georgia's process for renegotiating WIA performance levels?

Performance targets are set as part of the planning process, generally for two or more upcoming program years. If an area finds that unexpected circumstances have occurred and that those circumstances have a substantial impact on its performance outcomes, the area may request to have a performance adjustment. The area must explain the situation and effects on specific outcomes, and submit amended levels prior to the end of the program year.

Poor administrative decisions or ineffective changes to service delivery strategies are not considered grounds for renegotiation.

Please contact GDOL Career Development Services or Management Information and Customer Support with questions related to setting and renegotiating performance levels.

SUBPART D - INCENTIVES AND SANCTIONS FOR LOCAL PERFORMANCE

666.400   Under what circumstances are local areas eligible for State Incentive Grants?

What is the state's policy regarding incentive grants for local areas?

Georgia has used a portion of the funds reserved for statewide workforce investment activities to provide local incentive grants to local areas for the following:

- Regional Cooperation Among Local Boards
- Local Coordination of WIA Activities
- Exemplary Performance on the Local Performance Measures

666.410   How may local incentive awards be used?

666.420   Under what circumstances may a sanction be applied to local area for poor performance?

What happens the first time a local workforce area does not achieve an acceptable level on all performance measures?

If a local area does not achieve an acceptable level on all measures, GDOL will provide technical assistance aimed at helping the area improve performance. This assistance will be based on what contributed to the actual performance levels and how the area can enhance its performance.

What happens if a local workforce area does not achieve acceptable levels of performance for two years in a row?

Appropriate corrective action, examples of which are further identified in Section 666.420, will be taken if an area fails to meet performance standards for two consecutive years.

The State has provided the following guidance for performance questions that do not directly relate to a specific regulatory citation or law.

We understand that customers served with National Reserve funds are excluded from the performance measures. Can that be changed?

No. USDOL specifies in TEGL 7-99 that dislocated workers served exclusively with National Reserve Account funds under JTPA are to be excluded from WIA measures, as are WIA dislocated workers served exclusively with National Emergency Grants. Individuals served with both National Reserve/National Emergency *and* formula funds do count for local and state performance.

What happens if a person receives WIA funded intensive or training services from one local area and then comes to another area's One-Stop? Related to this question, if a customer receives WIA funded services in one local area but wishes to attend training in another, can the customer be transferred to a new area without the original workforce board exiting the customer and receiving a negative termination?

In all cases, the customer's needs should be addressed. Partner staff from both areas must communicate to make sure they are not providing conflicting and/or duplicative services or guidance.

Both the Workforce Investment Act Standardized Record Data (WIASRD) and the GWS limit an individual to one active WIA registration at a time. When a registrant receives services from more than one area, the areas must reach a decision on where to report and count the customer for performance. Possible options include:

- Exit the customer from the first area and re-register in the second. That way, the individual could be counted in the performance of both areas. However, since the customer would have to receive no services for 90 days in order to be exited from one area and register in another, this option would not provide optimal customer service.
- The first area could continue to fund and serve the individual. For instance, WIA allows a local area to issue an Individual Training Account (ITA) for a customer to attend training in another local area or region. In fact, this will likely happen frequently. An ITA follows an individual customer anywhere within the State, and even in some cases across state lines with ITA eligible providers approved in those states. In all cases, local Workforce Investment Board policies determine the parameters and limits for such out-of-area service.

- The areas could agree to "transfer" the registrant to the new area. The second area could reimburse the first for any funds expended or agree to "transfer" without reimbursement. The state office would need to be notified of this change, then would contact each area to verify the intent, and change the WIA area code in GWS. The second area would then report and include the individual in their performance.

Please contact GDOL Career Development Services if you would like to propose a different option for your area.

If a customer has moved into another age bracket (such as from 14-18 to 19-21, or from 19-21 to adult), how will the GWS include them in the appropriate performance measures? Is age recalculated at the time a service is assigned or do we need to re-register customers each time a service is assigned?

A customer's age is one factor used to determine the initial array of service options available and the appropriate funding for the selected services. Initial and subsequent funding choices, as well as the customer's age at the date of the first youth-funded service within a participation period, will determine which category or categories of performance measures apply.

As a result of changes to the reporting requirements that were implemented beginning in PY 2005, USDOL developed new software that includes some "edit checks." These programmed edit checks provide either a warning message if certain conditions are met or, in some cases, reject entire records so that they are excluded in the numbers for the Annual Report. One of these edits rejects any youth record that indicates a customer is not between the ages of 14 and 21 years old at the time of the first youth service.

The customer's age in the GWS is currently calculated by subtracting the birth date from the date of the registration. Age at First Youth Service (displayed on Literacy/Numeracy pages) is calculated by subtracting the birth date from the Start Date of the first youth-funded service. Therefore, staff may not necessarily realize that a customer being served with youth funds, did not actually receive youth-funded services until after their 22nd birthday. In these cases, performance will not count in any youth performance calculations submitted for the Annual Report.

That being said, service and funding options may change over time. With the advent of automatic exits, it is not acceptable to exit and re-register customers while services continue to be provided. The GWS should provide an accurate and complete picture of all services that the customer is receiving.

Per directions provided by USDOL, State staff will use GWS data and UI wage records to calculate the appropriate measures for customers.

- Customers served with only youth funds will be measured as younger (14-18) or older (19-21) youth based on their age at the date of participation. A customer who turns 19 after this date will continue to be counted in the younger youth performance measures. A customer who turns 22 prior to the date of the first youth-funded service will have a rejected record, and will not count in any youth measures.
- Customers served with only adult funds will be measured as adults; an 18-year old customer served only as an adult will not be included in the youth performance measures.
- Customers served with only dislocated worker funds will be measured as dislocated workers (see the example above for adults; the same logic applies to dislocated workers)
- Customers served with multiple funding streams will be subject to measures for each fund source with the noted exceptions listed above.

What happens if we serve a customer with non-WIA funds in a GDOL career center, then a partner serves that same customer with WIA funds?

This scenario may occur often as seamless workforce services are delivered to meet customers' needs, and funding sources are blended. For example, an individual may receive some intensive services funded by Wagner-Peyser, then receive additional intensive or training services funded by WIA. From a performance measures perspective, each entity would be responsible for specific program outcomes and all gain when outcomes are positive. It is critical that partners communicate regularly with each other and the staff of the local workforce area.

Who is a "common customer"? What is an automatic exit?

A "common customer" is any individual who is seeking services from a local workforce area, Georgia Department of Labor career center, and/or any GDOL partner. This common customer approach allows our workforce system to be seamless to the customer and meet as many of their needs as fully as possible. As the customer receives services as needed from various offices or service providers, the performance outcomes will be shared across partners.

A customer exits when no staff-assisted services have been provided for 90 days. The exit date will be the date of the last staff-assisted service. Since the exits are determined automatically by dates in GWS, these can be referred to automatic, auto, or soft exits.

If we need to establish occupational or work-readiness youth goals, when will these goals be established – at registration, or later in the program?

Goals may be established later in the program when more assessment information is available. However, all younger youth (14-18 years at registration) who are served with WIA youth funds must have at least one skill goal set per registration year. If a youth is deficient in basic literacy skills, then the first goal must be a basic skills goal and the set date will be the registration date.

You may set as many goals as needed, in any combination, but only three per year will count toward performance.

*H*ow do we handle skills attainments for younger youth?

You can set as many goals as are appropriate per year, in any combination of basic skills, occupational, or work readiness goals, but only three will count toward performance. The customer has 12 months to meet skills goals and the 12-month period begins when the goals are set, rather than on a program year or school year basis. For youth who are basic skills deficient at registration (reading or math scores less than 8.9), a basic skills goal must be set at registration and services arranged accordingly.

Once a goal is identified, the service/activity designed to address goal attainment should include a process for measurement including customer status at entry, progress, and ultimate goal attainment. A pre/post test may be the measurement of basic skills attainment, in which case the post-test must be conducted with the pre-test instrument.

Where occupational skill attainment is the goal, a pre-test of occupational knowledge/performance might be appropriate, followed by the same test of knowledge/performance to measure attainment. Where work readiness is the goal, a pre-test of basic work maturity and the same post-test following the work maturity activity would be appropriate.

Where a current test score is available, the pre-test could be eliminated. For example, where a customer needs additional credits for graduation, documentation of the lack of credits at entry and attainment of credits could be the entry/end measurement.

Goal description and "set" and "met" dates are recorded in the GWS. See the memo from Management Information and Customer Support and Workforce Development (dated August 5, 2002) for data entry instructions.

*I*f a youth is deficient in basic skills, may we set an increase of one-half year (.5 grade level equivalency) as a goal? Schools report that youth who would be in our program rarely increase one year in reading/math within a year's time, so a half-year increase seems like a reasonable goal.

Setting goals is a local decision. The goal should reflect a genuine progression of skills, and be measurable and documented. Simply maintaining skills is not acceptable.

It may be useful to seek input from employers and educators in your community as your board considers youth policies. If your local school system concurs that a .5 grade level increase is realistic, the goal is acceptable.

After talking to some of our secondary school systems, they thought the following indicators would be reasonable for a year's accomplishment to take credit for an increase in basic skills. Are they?

Proposed Younger Youth (14-18 years) Performance Indicators for Basic Skills Attainment:

- *Student will increase overall grade point average (GPA) in core courses (Math, English, Science, and Social Studies and/or Foreign Language if college prep)*
- *All parts of the Georgia High School Graduation Test (GHSGT) will be passed*
- *Student will be on grade level at completion at school year*

These indicators appear reasonable for some students, as evidenced by affirmation from your local school system. However, they are most likely not appropriate for all students.

For example, it would not be realistic for a youth who enters the program as a 12th grader but is reading at a 7th grade level to increase five grade levels in a one-year period. Goals that are set each year, regardless of type, must be measurable, realistic, and individualized. A grade level increase may be used for basic skills goals, but it should be based upon assessment results. Depending on these results, a 9-month grade level increase in reading or math may be appropriate and realistic unless the individual's assessment indicates a learning disability.

The same can be said for the other two indicators listed. Not every student would qualify to take the GHSGT, and it is certainly unrealistic to expect that every student who takes it will pass each part. Students with higher grade point averages to begin with will have a much harder time increasing their GPAs in a one-year period than those who have extremely low GPAs. This would also apply to youth who enter the program in ninth grade as opposed to those who enter the program later on after many credits have been earned.

Assessment results should be thoroughly reviewed, and an individual goal should be designed specifically for each student - taking into consideration factors such as test results, school history, and academic barriers. The goal should challenge the student but should also be attainable within the anticipated timeframe.

***H**ow do we measure outcomes for youth in special education if they have a mental disability and probably won't be able to increase grade levels? Can we measure the ability to function on the job? How do we measure that someone doesn't function on the job?*

Outcomes for youth are reported for both the WIA statutory measures and common measures. The State currently negotiates performance levels only on the WIA statutory measures. However, it is clear that USDOL guidance in TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues, emphasize the provision of testing accommodations when serving youth with disabilities.

In discussing considerations for the Literacy/Numeracy measure, TEGL 17-05 states that: "ETA fully expects that most youth with disabilities can, and should, be assessed using tests that specifically crosswalk to educational functioning levels, using accommodations where needed. ETA also recognizes that in very limited instances, use of these testing instruments, even with appropriate accommodations, may not provide a valid or reliable evaluation of the literacy and numeracy skills of a youth with one or more disabilities. These instances may arise because of the nature or extent of a particular individual's disability, and/or because of limitations in the testing instruments themselves. In those rare instances, service providers and grant recipients may use alternate assessment tools to measure gains in numeracy and literacy for youth with disabilities, if those alternate tools have been deemed by an individual state to provide valid and reliable indicators of information that are comparable to the information provided through the educational functioning levels.

Such alternate tools may include, but are not limited to: portfolio assessments; one-on-one performance assessments; and alternative standardized tests. Each state should identify at least one alternative assessment tool that can be used in such situations. If such alternative assessment tools are used, the state should determine, based on the type of assessment, what constitutes a successful gain for the literacy/numeracy measure."

At this time, Georgia does not have an alternative assessment tool approved for use in measuring literacy/numeracy for those *rare instances* in which it would be appropriate. It is important to remember that the literacy/numeracy measure applies only to out-of-school youth who are basic skills deficient.

Youth with disabilities are often served in programs designed with employment and educational attainment outcomes, both of which are integral components of the youth common measures and the WIA statutory measures. High school students with disabilities who complete their Individualized Education Plan (IEP), earn a Special Education Diploma, and become employed meet most of the required measures for youth.

Out-of-school youth who obtain and retain employment will meet employment-related performance benchmarks, but may not meet the Literacy/Numeracy or Certificate/Credential attainment measures. If a local area serves a disproportionately large number of these customers, then it would be appropriate to request a renegotiation of the related youth statutory measures. It is important to remember, however, that a holistic and individualized approach that addresses all of the needs of youth with disabilities will result in positive outcomes for the youth as well as the overall workforce system.

Please explain WebFOCUS and how we can use WebFOCUS data to understand our area's performance.

GDOL purchased licenses for state and local staff use of WebFOCUS, a reporting software package used to retrieve and manipulate the data contained in the GWS. Local areas may also use WebFOCUS to retrieve data from various databases used by the State to report participant data to USDOL. Reports generated by WebFOCUS can be used to assist with data management and validation as well as program evaluation.

There are various reports, called canned reports, which have been created by state staff and are located in the WIA domain of WebFOCUS for access by any local area. These reports are standard reports that are based on local area needs for both local and system-wide performance-related and program characteristics information.

Local areas can also create their own customized WebFOCUS reports, called ad hoc reports. In order to effectively create these customized reports for performance and data management, users designing the reports must have basic knowledge of the GWS data elements, how performance measures are calculated, and timeframes for collecting data used in performance.

Additionally, certain standard reports are emailed to designated local area staff at various intervals (weekly, monthly, and quarterly) to assist in identification of potential performance concerns, as well as, potential data entry errors.

Currently, there are limitations to the local area's ability to run performance reports since wage records are a primary source of data for adult, dislocated worker, and older youth performance measures. Other existing WebFOCUS canned reports, however, may provide indicators of how well an area or provider will perform on various measures. The value of regularly monitoring performance measures is to manage data input so that it accurately presents a true picture of the services provided and outcomes achieved. Through this process, workforce areas may consider altering program designs that will ultimately have a positive effect on local area performance.

What are the "common measures" and how will they be applied to WIA?

USDOL announced in 2005 that WIA, Wagner-Peyser (ES), and Trade programs would be evaluated using a set of common measures effective July 1, 2005. These measures were developed at the direction of the President as part of his management agenda. The measures are intended as a "common yardstick" for making budget decisions at the federal level. All employment and training programs will be evaluated against the same set of measures. USDOL's TEGL 17-05 (Attachment C) can be found at: http://wdr.doleta.gov/directives/.
The adult measures include entered employment, retention, and average earnings. The youth measures include placement in employment or education, diploma or credential attainment, and literacy and numeracy gains. There are no separate measures for dislocated workers, and there is no distinction between older and younger youth.

Federal guidance on common measures definitions and an implementation schedule were issued through TEGL 17-05 in February 2006. Until WIA reauthorization occurs, states and local areas will report on both common and statutory measures, but be held accountable for just the 17 statutory measures.

In March 2006 at the GDOL Common Measures Roundtable, the Common Measures Resource Guide, a collection of documents and resources related to common measures, was distributed. At least one guide should be located in each local workforce area, and it should be updated periodically with information and federal/state guidance pertinent to common measures. If you cannot locate this resource for your local area, please contact GDOL Career Development Services.

What is the State doing to ensure that local areas have input regarding the implementation of common measures?

In October of 2005, the state created a Common Measures Implementation Workgroup, that has since been renamed the Local Advisory Group on Common Measures. This workgroup was formed from designated WIA and career center local area staff and state-level policy, technical, and service staff. Through this mix of representation, the workgroup discusses and makes suggestions regarding state level policies and technical implementation in regard to common measures.

What is "common reporting?"

USDOL has proposed to change reporting to a "Workforce Investment Streamlined Performance Reporting" (WISPR) system. Under WISPR, states would report TAA, ES, and WIA customers in a single, "common" participant file. The specifications and implementation date for the WISPR have not been finalized. We will provide more information on common reporting when it is released by USDOL.

We understand that the Test of Adult Basic Education (TABE), Comprehensive Adult Student Assessment System (CASAS),

WorkKeys, and Adult Basic Literacy Exam (ABLE) are crosswalked to the US Department of Education's Adult Basic Education (ABE) levels, so there shouldn't be a problem relative to the "Literacy and Numeracy Gain" measure in the upcoming common measures. If we use the Wide Range Achievement Test (WRAT), Wonderlic Basic Skills Test (WBST), or another instrument other than the four listed above, what should we do?

Local areas may continue to use any of their current basic skills tests, such as TABE, CASAS, WorkKeys, ABLE, or one of the English as a Second Language (ESL) instruments listed in TEGL 17-05, Attachment C to document or assess basic skills levels. However, for purposes of the Literacy/Numeracy Gain measure, assessment tests listed in TEGL 17-05 will have to be used. As such, it would be beneficial to begin utilizing any of the tests described in TEGL 17-05. Please contact GDOL Career Development Services if you encounter any issues with these instruments or difficulties converting to other tests.

TEGL 17-05 contains a good discussion of the Literacy and Numeracy Gains measure. Information about the crosswalk between standard assessment instruments and the ABE levels is at: http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195. (See Attachment C of TEGL 17-05 for the crosswalk information.)

In January 2007, at GDOL Youth Literacy/Numeracy Training, a Youth Literacy/Numeracy Training Guide (dated December 2006) was distributed to each local area. This guide provides further instructions and guidance about the Literacy/Numeracy Gains performance measure and related GWS data entry. (See **Appendix 6**, Youth Literacy/Numeracy Guide)

What is Data Validation?

Georgia has completed four previous cycles of data validation up to PY2006. For the PY2006 Data Validation sessions, USDOL issued TEN 9-06 in August 2006 to announce preliminary guidance for data validation implementation for WIA, Trade, and Wagner-Peyser (ES). This TEN can be found at: http://wdr.doleta.gov/directives/. The most current information on the data validation process, including user guides and handbooks, can be found at: www.doleta.gov/performance/reporting/.

There are two validation components – reports and data elements. Report validation will be applied to the WIA annual report to confirm states' reported performance. Data element validation is more complex. Based on risk factors associated with some reported data and the number of customers in a state's Workforce Investment Act Standardized Record Data (WIASRD), certain cases will be selected for validation.

This will be similar to the recent USDOL data review in some respects. USDOL expects the State to find eligible source documentation (e.g., documentation in case notes, GWS, and/or other automated systems, forms, other local/state/federal official documents) in

local files to support the data submitted. The complete listing for PY 2006 data validation source documentation may be found in TEN 9-06.

The Crosswalk of Data Elements and GDOL GWS Matches provides the acceptable data sources that should be collected as validation of each respective data element. (See **Appendix 7, Data Validation/WIASRD Crosswalk**)

Management Information and Customer Support coordinates the GDOL data validation efforts, in conjunction with Career Development Services. USDOL's deadline for completing the most recent PY 2006 WIA report and data element validation is Spring 2007.